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UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

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DAVID GRAHAM GOODMAN,

Plaintiff,

vs.

Civil Action No.: 1:13cv540

KENNETH W. STOLLE, et al.,

Defendants.

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VIDEOCONFERENCE DEPOSITION OF DAVID GRAHAM GOODMAN

October 12, 2021

1:07 p.m.

HALASZ REPORTING & VIDEO

1011 East Main Street, Suite 100

Richmond, Virginia 23219

(804)708-0025

REPORTED BY: PAULA MARIE MADDERN, CCR

1           A     Correct.

2           Q     So you knew that next day when you wrote  
3     this statement on November 8th, 2012, that you were  
4     going to file a lawsuit against these deputies,  
5     right?

6           A     Yes, sir, I did.

7           Q     All right. And then according to your  
8     statement, you were taken to the medical and seen by  
9     a nurse in medical, correct?

10          A     Yes.

11          Q     And do you have any problem or issue with  
12     the treatment that you received from the nurse in the  
13     medical department that evening or afternoon?

14          A     That in itself, no. But the statement  
15     that they later released is not the way it went down,  
16     the nurse suggested that I be taken to the hospital,  
17     and she believed also that I had a concussion. And  
18     the sergeant that was in medical refused that  
19     treatment.

20          Q     All right. So it's your testimony that  
21     the nurse you saw at the Virginia Beach Correctional  
22     Center recommended you receive additional treatment,  
23     and a sergeant at the sheriff's department refused?

24          A     Correct.

25          Q     When you said earlier that that

1 statement -- the statements that they released, I  
2 think you said it wasn't accurate. What statement  
3 are you talking about?

4 A It's not accurate.

5 Q The question is: What statement are you  
6 talking about?

7 A The statement that, five years later, I  
8 received from the Virginia Beach Sheriff's Department  
9 of how she patched it up and cleaned it up and that  
10 was the end of the conversation.

11 Q So you're referring to the nurse, who you  
12 saw at the correctional center's notes, you're saying  
13 her notes are not correct?

14 A Not as the way it transpired that night,  
15 no, sir. They're not complete.

16 Q What is not complete about the nurse's  
17 notes from the Virginia Beach Correctional Center on  
18 that evening?

19 A There's no statement that she informed  
20 them that I needed further treatment; that I needed  
21 to be x-rayed and seen for a concussion or any of  
22 that. It's all left out. It's like it's been  
23 doctored.

24 Q Did you hear a conversation between the  
25 nurse who treated you and the sergeant?

1           A     Yes, I did.

2           Q     And what did she say to the sergeant and  
3 what did the sergeant say to her?

4           A     She told the sergeant point blank that I  
5 needed to be taken to the hospital, x-rayed, and  
6 examined further for a concussion; that she felt I  
7 had a probable concussion. And the sergeant looked  
8 at her and then at me and said, "Denied."

9           Q     Did you hear any other conversation  
10 between the nurse and the sergeant that evening?

11          A     Just minor things that what she was doing  
12 and so forth.

13          Q     What do you mean by that?

14          A     That she was cleaning it up and this and  
15 that. They had taken a couple of steps back when  
16 they were discussing this.

17          Q     All right. And so once the nurse was  
18 complete with whatever she did with you and however  
19 she treated you, what happened next?

20          A     I was taken back to medical isolation and  
21 dumped in the floor again.

22          Q     Who took you back?

23          A     I don't know. A deputy, that's all I can  
24 tell you.

25          Q     What do you mean by dumped on the floor?